

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

Thomas E. Underwood and Donald E. Lee, individually
and on behalf of all others similarly situated,

Plaintiff,

v.

Case No. 2:13-cv-14464
Hon. Laurie J. Michelson

Carpenters Pension Trust Fund - Detroit
and Vicinity Pension Plan (“Plan”) and
Trustees of the Plan,

Defendants.

CLASS ACTION

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**MOTION TO ENLARGE PAGE LIMIT FOR BRIEF IN SUPPORT OF
MOTION FOR COMMON FUND ATTORNEYS’ FEES, COSTS AND
EXPENSES, AND INCENTIVE AWARDS TO THE NAMED PLAINTIFFS**

Respecting their Brief in Support of Motion for Common Fund Attorneys’
Fees, Costs and Expenses, and Incentive Awards to the Named Plaintiffs (“Brief”),
Class Counsel request that the 25-page limit for briefs in this Court be enlarged to 50

pages. The reasons in support of the requested enlargement are as follows:

1. The Brief requests (i) attorneys' fees, (ii) costs and expenses, and (iii) incentive awards to the two Named Plaintiffs.

2. Although Class Counsel could have filed a separate motion and brief for each of these requests, Class Counsel combined the requests into one motion and brief in order to avoid duplication of facts in three separate motions and, thereby, save time for the Court.

3. As noted at the outset of the Brief, the Court may wish to skip to Part II. G. at page 13 of the Brief if it believes a review of the principal proceedings in this case is unnecessary.

4. Because Class Counsel does not know whether the Court prefers the percentage approach or lodestar-with-multiplier approach in determining the reasonable common fund fee, Class Counsel provided the Court with a thorough analysis under both approaches, which unavoidably contributed to the Brief's total pages.

For all of these reasons, Class Counsel request that the Court enter an order enlarging the pages for the Brief to 50 pages. A proposed Order has been submitted to the Court via the Utilities function of the Court's CM/ECF system.

Respectfully submitted November 3, 2016

/s/ Eva T. Cantarella

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CERTIFICATE OF SERVICE

I hereby certify that on November 3, 2016, I served on the below counsel for Defendants (i) Motion to Enlarge Page Limit for Brief in Support of Motion for Common Fund Attorneys' Fees, Costs and Expenses, and Incentive Awards to the Named Plaintiffs; and (ii) this Certificate of Service, via the Court's CM/ECF system. I also submitted a proposed Order to the Court via the Utilities functions of the Court's CM/ECF system, and emailed the proposed Order to the below counsel for Defendants.

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